

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

Civil Action No.: 2:21-cv-310-JRG

**DECLARATION OF ANDREW S. ONG IN SUPPORT OF DEFENDANTS' OPPOSED
MOTION FOR A PARTIAL STAY**

I, Andrew S. Ong, declare and state as follows:

1. I am an attorney at Goodwin Procter LLP, and counsel of record for Defendants in the above-entitled case. I have personal knowledge of the facts stated herein and, if called as a witness, I could and would competently testify as to the following.

2. Attached hereto as Exhibit 1 is a true and correct copy of the document filed at D.I. 380 in *TQ Delta, LLC v. 2Wire, Inc.*, No. 1:13-cv-01835-RGA (D. Del.) (“2Wire”).¹

3. Attached hereto as Exhibit 2 is a true and correct copy of the document filed at D.I. 1125 in the *2Wire* case.

¹ The ECF header for some of the documents from the District of Delaware may not match up to the docket number referenced in this declaration, as some documents were filed in multiple cases and, thus, have an ECF header from another related case.

4. Attached hereto as Exhibit 3 is a true and correct copy of the document filed at D.I. 477 in the *2Wire* case.

5. Attached hereto as Exhibit 4 is a true and correct copy of the document filed at D.I. 437 in the *2Wire* case.

6. Attached hereto as Exhibit 5 is a true and correct copy of the document filed at D.I. 1028 in the *2Wire* case.

7. Attached hereto as Exhibit 6 is a true and correct copy of the document filed at D.I. 486 in the *2Wire* case.

8. Attached hereto as Exhibit 7 is a true and correct copy of the document filed at D.I. 1058 in the *2Wire* case.

9. Attached hereto as Exhibit 8 is a true and correct copy of the document filed at D.I. 1271 in the *2Wire* case.

10. Attached hereto as Exhibit 9 is a true and correct copy of the document filed at D.I. 1276 in the *2Wire* case.

11. Attached hereto as Exhibit 10 is a true and correct copy of the document filed at D.I. 1354 in the *2Wire* case.

12. Attached hereto as Exhibit 11 is a true and correct copy of the document filed at D.I. 445 in the *2Wire* case.

13. Attached hereto as Exhibit 12 is a true and correct copy of the document filed at D.I. 1106 in the *2Wire* case.

14. Attached hereto as Exhibit 13 is a true and correct copy of the document filed at D.I. 1187 in the *2Wire* case.

15. Attached hereto as Exhibit 14 is a true and correct copy of the document filed at D.I. 1188 in the *2Wire* case.

16. Attached hereto as Exhibit 15 is a true and correct copy of the document filed at D.I. 473 in the *2Wire* case.

17. Attached hereto as Exhibit 16 is a true and correct copy of the document filed at D.I. 1239 in the *2Wire* case.

18. Attached hereto as Exhibit 17 is a true and correct copy of the document filed at D.I. 1585 in the *2Wire* case.

19. Attached hereto as Exhibit 18 is a true and correct copy of the document filed at D.I. 1589 in the *2Wire* case.

20. Attached hereto as Exhibit 19 is a true and correct copy of the oral order entered at D.I. 1597 in the *2Wire* case.

21. Attached hereto as Exhibit 20 is a true and correct copy of the document filed at D.I. 535 in the *2Wire* case.

22. Attached hereto as Exhibit 21 is a true and correct copy of the document filed at D.I. 1567 in the *2Wire* case.

23. Attached hereto as Exhibit 22 is a true and correct copy of the document filed at D.I. 1580 in the *2Wire* case.

24. Attached hereto as Exhibit 23 is a true and correct copy of the oral order entered at D.I. 1594 in the *2Wire* case.

25. Attached hereto as Exhibit 24 is a true and correct copy of an article by John R. Allison et al., *Understanding the Realities of Modern Patent Litigation*, 92 Tex. L. Rev. 1769 (2014).

26. Attached hereto as Exhibit 25 is a true and correct copy of an article by Carla Salvatore, *Albright Worried Multipatent Trials Ask Too Much of Jurors*, Law360 (Dec. 18, 2020), available at <https://www.law360.com/articles/1337976>.

27. Attached hereto as Exhibit 26 is a true and correct copy of an email that I sent on May 19, 2022 to counsel for TQ Delta.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Dated: May 24, 2022

By: /s/ Andrew S. Ong
Andrew S. Ong